

United States Court  
Southern District of Texas  
FILED  
JUL 21 2019  
Brady

David J. Bradley, Clerk of Court  
1/7/2019

UNITED STATES DISTRICT COURT  
for the  
Southern District of Texas

United States of America )  
v. )  
Larry Torres ) Case No. 2:19mj2783  
)  
)  
)  
)

**Defendant(s)**

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 19, 2019 in the county of Nueces in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

### *Offense Description*

21 USC 841(a)(1) It shall be unlawful for any person knowingly or intentionally to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance.

Possession with Intent to Distribute

This criminal complaint is based on these facts:

(See Attachment A - Affidavit)

Continued on the attached sheet.



Complainant's signature

Cliff Sutton, Special Agent

**Printed name and title**

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on

Date: 07/21/2019

City and state: Corpus Christi, Texas

B. Janice Ellington - United States Magistrate Judge

**Printed name and title**

**ATTACHMENT A**

I, CM Sutton, being duly sworn, depose and state that:

I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF), United States Department of Justice, and have been employed since September 2013. I am a graduate of the Federal Law Enforcement Training Center. I have been trained to conduct criminal investigations, participate in search warrants and the execution of arrest warrants. Prior to my experience with the ATF I was a Houston Police Officer for over four years. I hold a Bachelor's of Science degree from Sam Houston State University in Criminal Justice.

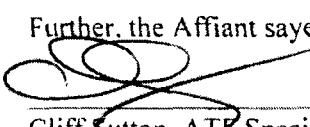
Further, the Affiant states as follows:

I am familiar with certain Federal criminal laws and know that it is a violation of 21 USC 841(a)(1) It shall be unlawful for any person knowingly or intentionally to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance.

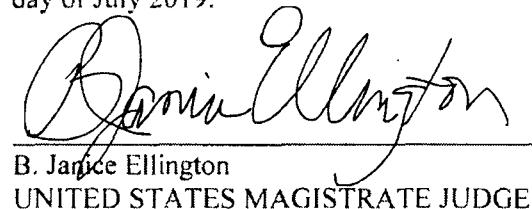
1. This affidavit is in support of a criminal complaint charging Larry TORRES, (hereinafter referred to as "TORRES"), with the criminal violation set forth in Attachment A. The evidence available to me demonstrates there is probable cause to believe TORRES has violated Title 21 USC 841(a)(1).
2. On July 19, 2019, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) conducted an operation and purchased approximately 87 grams of suspected methamphetamine from TORRES.
3. Agents purchased a white colored substance believed to be methamphetamine from TORRES. The substance had an approximate gross weight of 87 grams. Based on my training and experience, the substance purchased by agents was in fact methamphetamine. From previous training and experience, this is an amount of methamphetamine that is not for personal use but for distribution.
4. Based on the investigation and the evidence purchased from TORRES, your affiant believes Larry TORRES possessed the methamphetamine to distribute this substance in violation of Title 21, United States Code, Section 841(a)(1).

This criminal complaint was approved for filing by AUSA David Paxton.

Further, the Affiant sayeth not.

  
Cliff Sutton, ATF Special Agent

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on 21<sup>st</sup> day of July 2019.

  
B. Janice Ellington  
UNITED STATES MAGISTRATE JUDGE